



ORIGINAL.

March 14, 2013

VIA FED EX

Mr. Kenneth I. Rose, III Financial Analyst (3HS62) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

Re: Supplement to Request for Information Pursuant to Section 104 of CERCLA

Metro Container Superfund Site

Metro Container Superfund Site U.S. EPA Request for Information

42 U.S.C. § 9601-9675

Dear Mr. Rose:

This letter serves to supplement the Information Request Response of Stauffer Management Company, LLC ("Stauffer") dåted April 18, 2012, which was sent in response to your Request for Information dated March 9, 2012 ("Response").

- 1. Response 4(g)(3) in SMC's April 18, 2012 letter indicates that lagoons, ponds, pits, landfills, or other temporary or permanent disposal areas (collectively "Units") were constructed and/or used at the Property during the time Stauffer operated there. For each Unit present on the Property during the time Stauffer owned and/or operated at the Property, please:
 - a. Identify where the Unit was located on the Property;

Answer: In response to EPA's request for additional information dated January 29, 2013, Stauffer Management Company ("Stauffer") conducted a search of its records for information related to the lagoons, ponds, pits, landfills, disposal areas (units). Stauffer Management Company found no specific information pertaining to this request other than a site sketch prepared by the Weston Sper company in 1987 attached hereto as Exhibit A. The site sketch references a lagoon adjacent to Stoney Creek and near the Site's storage tanks.

b. Provide a copy of all documents which refer or relate to the construction or opening of the Unit;

<u>Answer</u>: Stauffer responds that it conducted a reasonable search and examination of all records in its possession, custody, and control and found no specific information pertaining to this request.

Joe P. Yeager Associate T. 302.984.6391 F. 302.691.2162 jyeager@mccarter.com

McCarter & English, LLP Renaissance Centre 405 N. King Street, 8th Floor Wilmington, DE 19801-3717 T. 302.984.6300 F. 302.984.6399 www.mccarter.com

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD ·

WILMINGTON

c. Identify when Stauffer began to use the Unit;

Answer: See Answer to Request 1(b), above.

d. Identify when Stauffer ceased using the Unit;

Answer: See Answer to Request 1(b), above.

e. Provide a copy of all documents which refer or relate to the closing, decommissioning, or discontinued use of the Unit;

Answer: See Answer to Request 1(b), above.

f. Provide a copy of all documents which refer or relate to the cleanout of such Unit at any time;

Answer: See Answer to Request 1(b), above.

g. Identify all raw materials, by-products, wastes, and other materials (collectively "Waste") placed into the Unit;

Answer: See Answer to Request 1(b), above.

h. Identify all hazardous substances contained within the Waste placed into the Unit;

Answer: See Answer to Request 1(b), above.

i. Provide a copy of all documents which refer or relate to the Wastes placed into the Unit including, without limitation, all analyses of samples taken from such Waste:

Answer: See Answer to Request 1(b), above.

j. Describe the processes from which the Wastes placed into the Unit were generated;

Answer: See Answer to Request 1(b), above.

k. Describe all actions taken to modify, close, cleanout, and/or remediate the Unit (your response should include, without limitation, the date each action was commenced, the nature of such action, and the date such action was completed); and

Answer: See Answer to Request 1(b), above.

I. Provide a copy of all documents which refer or relate to each action identified in response to Question I(k), above.

Answer: See Answer to Request 1(b), above.

2. Response 4(g)(3) in SMC's April 18, 2012 response letter indicates that filter cake was disposed of the Property or into Stoney Creek during the period Stauffer operated at the Property. For each instance in which filter cake was so disposed, please:

Answer: In response to EPA's request for additional information dated January 29, 2013, Stauffer conducted a search of its records for information related to Stoney Creek, filter cake, and disposal. Stauffer found no specific information, or any records, responsive to this Request.

a. Identify where on the Property or within Stoney Creek such filter cake was disposed;

Answer: Stauffer has conducted a reasonable search and examination for, but did not find, any specific records responsive to this Request.

b. Identify the process from which such filter cake was generated including, without limitation, the materials that would have flowed through the filter to produce the filter cake and the materials that would have passed through the filter;

Answer: See Answer to Request 2(a), above.

c. Identify the composition of such filter cake including, without limitation, the hazardous substances contained within such filter cake;

Answer: See Answer to Request 2(a), above.

d. Provide a copy of all documents which refer or relate to the composition of the filter cake including, without limitation, the results of any analytical testing performed on such filter cake; and

Answer: See Answer to Request 2(a), above.

e. Provide a copy of all documents which refer or relate to the disposal of such filter cake on the Property.

Answer: See Answer to Request 2(a), above.

3. Provide a copy of all environmental assessments and investigations performed at the Property or in Stoney Creek by or on behalf of Stauffer at any time.

<u>Answer</u>: Stauffer conducted a reasonable search and examination of all records in its possession, custody, and control and found no documents responsive to this Request.

4. State whether PCBs and/or PCB-containing equipment, material, or compounds was present at the Property during the period Stauffer owned and/or operated at the Property. For each piece of PCB-containing equipment, material, or compound ("PCB Item") present at the Property during such period:

<u>Answer</u>: Stauffer responds that it conducted a reasonable search and examination of all records in its possession, custody, and control and found no information responsive to this request.

a. Identify the PCB Item (e.g., PCB in oil within a transformer);

Answer: See Answer to Request 4, above.

State when the PCB Item was first used on the Property;

Answer: See Answer to Request 4, above.

c. State when use of the PCB Item was discontinued;

Answer: See Answer to Request 4, above.

d. Identify each instance in which PCB-containing materials were installed into and/or removed from the PCB Item;

Answer: See Answer to Request 4, above.

e. Identify each instance in which PCBs leaked, spilled, or were otherwise released at or from the PCB Item (your response should include, but should not be limited to, the date of each instance, the source of the PCBs released, the volume of PCB-containing material released, and the date and nature of all actions taken in response to such release); and

Answer: See Answer to Request 4, above.

f. Provide a copy of all documents which refer or relate to the leakage, spillage, or other release of PCBs from the PCB Item.

Answer: See Answer to Request 4, above.

5. Provide a copy of all documents which refer or relate to actions taken at any time to clean up PCBs leaked, spilled, or otherwise released at the Property.

<u>Answer</u>: Stauffer responds that it conducted a reasonable search and examination of all records in its possession, custody, and control and found no information responsive to this request.

6. Provide a copy of all documents prepared at any time to comply with 40 C.F.R, Part 761 in connection with the use, storage, and/or disposal of PCBs and/or PCB-containing equipment at the Property.

<u>Answer</u>: Stauffer responds that it conducted a reasonable search and examination of all records in its possession, custody, and control and found no information responsive to this request. Stauffer's period of ownership of the Property pre-dated the enactment of the Toxic Substances Control Act.

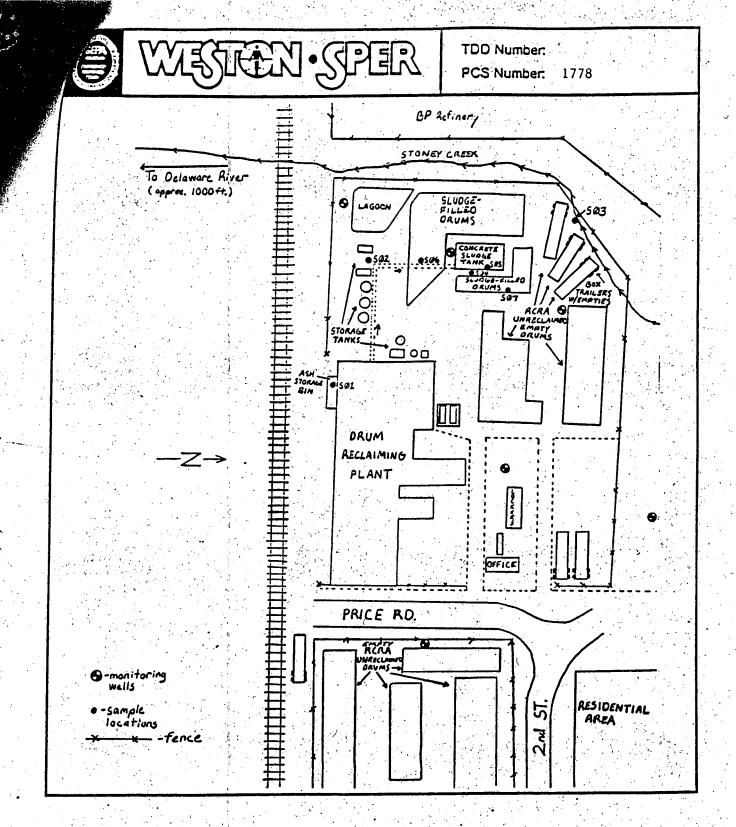
Sincerely,

Joe P. Yeager

Enclosures

cc: A. Richard Winchester Charles N. Elmendorf

Exhibit A



Metro Container Corporation Site Sketch 12/29/87

Not to Scale

TDD Number: PCS Number: 1778 Feltonville Trainer .. 1 Metor Container Corporation Topographic Map 160 MILS 5 MILS Marcus Hook, PA Quadrangle PENNSYLVANIA 12/29/87 QUADRANGLE LOCATION UTM GRID AND 1967 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET SCALE 1:24,000 . 0 ' 7000 FEET 5000 3000 1 KILOMETER 2000